

# **AMENDED**

# **EXHIBIT I**

*Improper Assertions of the  
Attorney-Client Privilege (No Client)*

ID Number	Produced Bates Stamp	Custodian	Date	Application	Subject	Author	To	CC	Filename	Treatment	Claim	Privilege Statement
DOC_0806487		Andre Montgomery	12/22/2022	Outlook Email	Legislative Report on CWPP	Andre Montgomery	Christina Adkins; Heidi Martinez			Privileged - Withhold	Attorney Client; Deliberative Process	Email communication between SOS attorneys regarding draft Legislative report on November 2020 election
DOC_0806885		Andre Montgomery	3/3/2023	Outlook Email	RE DRAFT email to Ellis County re Farmers Branch	Lena Proft	Elections-Attorneys			Privileged - Withhold	Attorney Client; Deliberative Process	Email conversation between SOS attorneys discussing draft email to Ellis County regarding implementation of SB1
DOC_0806901		Andre Montgomery	3/3/2023	Outlook Email	RE DRAFT email to Ellis County re Farmers Branch	Lena Proft	Heidi Martinez; Charles Pinney; Elections-Attorneys			Privileged - Withhold	Attorney Client; Deliberative Process	Email conversation between SOS attorneys discussing draft email to Ellis County regarding implementation of SB1
DOC_0806927		Andre Montgomery	3/3/2023	Outlook Email	Re DRAFT email to Ellis County re Farmers Branch	Charles Pinney	Lena Proft; Elections Attorneys			Privileged - Withhold	Attorney Client; Deliberative Process	Email conversations between SOS attorney and SOS legal regarding draft response email to Ellis County elections admin question on election procedures
DOC_0809364		Christina Adkins	1/10/2023	Outlook Email	Portions of Code that impact SOS	Heidi Martinez	Christina Adkins			Privileged - Withhold	Attorney Client	Email communication between SOS attorneys regarding portions of election code that impact SOS duties
DOC_0815319		Heidi Martinez	3/3/2023	Outlook Email	RE DRAFT email to Ellis County re Farmers Branch	Heidi Martinez	Lena Proft			Privileged - Withhold	Attorney Client	Emails among SOS attorneys regarding edits to a draft email to Ellis County regarding election procedures
DOC_0829571		Lena Proft	3/3/2023	Outlook Email	RE DRAFT email to Ellis County re Farmers Branch					Privileged - Withhold	Attorney Client	Email communication between SOS attorneys regarding Ellis County inquiry on election procedures
DOC_0805973		Andre Montgomery	8/8/2022	Outlook Email	2020 Election Results E-mails	Andre Montgomery	Heidi Martinez			Privileged - Withhold	Attorney Client; Deliberative Process	Email communication between SOS attorneys regarding election results emails